



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

RQ-2

June 30, 2022

NANCY MARKS, TREASURER  
DEVOLDER-SANTOS FOR CONGRESS  
47 FLINTLOCK DRIVE  
SHIRLEY, NY 11967

**Response Due Date**  
**08/04/2022**

IDENTIFICATION NUMBER: C00721365

REFERENCE: AMENDED APRIL QUARTERLY REPORT (01/01/2022 - 03/31/2022),  
RECEIVED 05/11/2022

Dear Treasurer:

This letter is prompted by the Commission's preliminary review of the report referenced above. This notice requests information essential to full public disclosure of your federal election campaign finances. **Failure to adequately respond by the response date noted above could result in an audit or enforcement action.** Additional information is needed for the following 7 item(s):

1. Schedule A of your report discloses one or more contributions that appear to exceed the limits set forth in the Act (see attached).

An individual or a political committee other than an authorized committee or qualified multi-candidate committee may not make a contribution(s) to a candidate for federal office in excess of \$2,900 per election. An authorized committee may not make a contribution(s) to a candidate for federal office in excess of \$2,000 per election. A qualified multi-candidate committee and all affiliated committees may not make a contribution(s) to a candidate for federal office in excess of \$5,000 per election. The term "contribution" includes any gift, subscription, loan, advance, or deposit of money or anything of value made by any person for the purpose of influencing any election for federal office. (52 U.S.C. § 30116(a) and (f) (formerly 2 U.S.C. § 441a(a) and (f)); 11 CFR § 110.1(b), (e) and (k))

If any apparently excessive contribution in question was incompletely or incorrectly disclosed, you must amend your original report with the clarifying information. If any contribution you received exceeds the limits, you may have to refund the excessive amount.

Excessive contributions may be retained if, within 60 days of receipt, the excessive portions are properly redesignated or reattributed. Guidelines for each

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option are provided below.

Please note that reattributions only apply to excessive contributions from individuals. An excessive contribution is considered properly reattributed if (1) the contributors provide the committee with written documentation, signed by each contributor, authorizing a reattribution and indicating the amount of the contribution to be attributed to each contributor; or (2) the committee reattributes by presumption the excessive portion of the contribution if the contribution was made on a written instrument from a joint account and was signed by only one of the account holders. In this case, the treasurer must notify the contributors in writing within 60 days of receiving the contribution that the committee intends to reattribute the excessive portion and must give the contributor an opportunity to request a refund. (11 CFR § 110.1(k)(3)(ii)(B))

Please note that you cannot presumptively redesignate an excessive contribution from a multi-candidate committee. Also, a contribution can only be redesignated to a previous election to the extent that the contribution does not exceed the committee's net debts outstanding for that election. (11 CFR § 110.1(b)(3)(i))

If the foregoing conditions for reattributions or redesignations are not met within 60 days of receipt of the contribution, the excessive amount must be refunded. See 11 CFR § 103.3(b)(1).

If you have not already done so, please inform the Commission of your corrective action immediately in writing and provide photocopies of any refund checks and/or letters reattributing or redesignating the contributions in question. Refunds are reported on Line 20(a), (b), or (c), as applicable, of the Detailed Summary Page and on a supporting Schedule B of the report covering the period in which they are made. Redesignations and reattributions are reported as memo entries on Schedule A of the report covering the period in which the authorization for the redesignation and/or reattribution is received. (11 CFR § 104.8(d)(2), (3) and (4))

Although the Commission may take further legal action concerning the acceptance of excessive contributions, your prompt action to refund, redesignate, and/or reattribute the excessive amount will be taken into consideration.

**2.** Schedule A of your report discloses one or more contributions that appear to exceed the limit set forth in the Act (see attached).

No political committee other than a qualified multi-candidate committee may

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make contributions to a candidate for federal office in excess of \$2,900 per election. The attached PACs did not meet the requirements for qualified multi-candidate status as of the date the contribution(s) was made to your committee. The term "contribution" includes any gift, subscription, loan, advance, or deposit of money or anything of value made by any person for the purpose of influencing any election for federal office. (52 U.S.C. § 30116(a) and (f) (formerly 2 U.S.C. § 441a(a) and (f)); 11 CFR § 110.1(b))

If any apparently excessive contribution in question was incompletely or incorrectly disclosed, you must amend your original report with the clarifying information.

If any contribution(s) you received exceeds the limits, you may have to refund the excessive amount. The funds can be retained if, within 60 days of receipt, the excessive amount is properly redesignated for a different election. An excessive contribution is considered properly redesignated if (1) the committee obtains signed written documentation from the contributor(s) authorizing the redesignation of the contribution for another election, provided that the new designation does not exceed the limitations on contributions made with respect to that election; or (2) the committee redesignates by presumption the excessive portion of the contribution for another election provided that the new designation does not exceed the limitations on contributions made with respect to that election. In this case, the treasurer must notify the contributor of the redesignation in writing within 60 days of the treasurer's receipt of the contribution. The notification must give the contributor an opportunity to request a refund. (11 CFR § 110.1(b)(5)(ii)(B)) A contribution can only be redesignated to a previous election to the extent that the contribution does not exceed net debts outstanding for that election. (11 CFR § 110.1(b)(3)(i))

If you have not already done so, please inform the Commission of your corrective action immediately in writing and provide photocopies of any refund checks and/or letters redesignating the contributions in question. Refunds are reported on Line 20(a), (b), or (c), as applicable, of the Detailed Summary Page and on a supporting Schedule B of the report covering the period in which they are made. Redesignations are reported as memo entries on Schedule A of the report covering the period in which the authorization for the redesignation is received. (11 CFR § 104.8(d)(2), (3) and (4))

Although the Commission may take further legal action concerning the acceptance of excessive contributions, your prompt action to refund or redesignate the excessive amount will be taken into consideration.

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3. Schedule A of your report discloses one or more in-kind contributions made before the primary election that are designated for the general election and appear to exceed the limits set forth in the Act (see attached).

In-kind contributions of equipment, such as computers, with a long-term useful life (e.g., an election cycle, or perhaps longer) are similar to contributions of money and may be designated for elections beyond the next election, provided the contributor designates the contribution as such in writing. A contribution of this type of equipment is distinguishable from in-kind contributions that are used only for one particular election, such as non-exempt contributions of food or beverages consumed by primary election day workers, or printing or mailing costs related to general election events or fundraisers.

The in-kind contribution on your report does not have a "long-term useful life" and constitutes an excessive contribution for the primary election (see Advisory Opinion 1996-29). You must refund the excessive amount to the donor.

If any apparently excessive contribution in question was incompletely or incorrectly disclosed, you must amend your original report with the clarifying information.

If you have not already done so, please inform the Commission of your corrective action immediately in writing and provide photocopies of any refund checks. Refunds are reported on Line 20(a), (b) or (c), as applicable, of the Detailed Summary Page and on a supporting Schedule B of the report covering the period in which they are made. (11 CFR § 104.8(d)(2), (3) and (4))

Although the Commission may take further legal action concerning the acceptance of excessive contributions, your prompt action to refund the excessive amount will be taken into consideration.

4. Schedule A of your report discloses one or more contributions that appear to be from a limited liability corporation(s) (LLC) (see attached). 11 C.F.R. §110.1(g) allows the receipt of contributions from LLCs providing the LLC is treated as a partnership for tax purposes, and has not elected to be treated as a corporation by the Internal Revenue Service (IRS). Both LLCs that claim corporate status and those that are publicly traded would be treated as corporations for FECA purposes.

Please amend your report to clarify if the LLCs in question are treated as partnerships. If any apparently prohibited contribution in question was incompletely or incorrectly disclosed, you must amend your original report with

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clarifying information.

If you have received prohibited contributions, you must make a refund. (11 CFR § 103.3(b)(1)) The refund must be made within 30 days of the treasurer becoming aware of the illegality of the contribution. (11 CFR § 103.3(b)(2))

If you have not already done so, please inform the Commission of your corrective action immediately in writing and provide a photocopy of any refund checks. Refunds must be reported on a Schedule B supporting Line 20(a) of the report covering the period in which the refund was made. (11 CFR § 104.8(d)(4))

Although the Commission may take further legal action concerning the acceptance of prohibited contributions, your prompt action to refund the prohibited amount will be taken into consideration.

**5.** Schedule A of your report discloses one or more contributions from an organization(s) which is not a political committee registered with the Commission (see attached). In order for your committee to accept contributions from unregistered organizations, your committee should take steps to ensure that the contributor(s) used permissible funds to make the contribution(s) to avoid violating 52 U.S.C. §§ 30116(f) and 30118 (formerly 2 U.S.C. §§ 441a(f) and 441b) or 11 CFR §102.5(b). Under 11 CFR §102.5(b), organizations which are not political committees under the Act and choose to contribute to federal committees must either: (1) establish a separate account which contains only those funds permitted under the Act, or (2) demonstrate through a reasonable accounting method that the organization has received sufficient funds subject to the limitations and prohibitions in order to make the contribution.

If any apparently prohibited contribution in question was incompletely or incorrectly disclosed, you should amend your original report with clarifying information. In addition, please clarify whether the contribution(s) received from the referenced organization(s) is permissible.

If you have received prohibited contributions, you must make a refund. (11 CFR § 103.3(b)(1)) The refund must be made within 30 days of the treasurer becoming aware of the illegality of the contribution. (11 CFR § 103.3(b)(2))

If you have not already done so, please inform the Commission of your corrective action immediately in writing and provide a photocopy of any refund checks. Refunds must be reported on a Schedule B supporting Line 20(b) or (c), as applicable, of the report covering the period in which the refund was made. (11 CFR § 104.8(d)(4))

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Although the Commission may take further legal action concerning the acceptance of prohibited contributions, your prompt action to refund the prohibited amount will be taken into consideration.

6. Schedule C of your report fails to include information required by Commission Regulations. With every report submitted, you must provide the name and address of the loan source, the date incurred, the original amount of the loan, the due date, the interest rate, the cumulative payment, and the outstanding balance. In addition, if there are any endorsers or guarantors, their mailing address, along with the name of their employer and occupation, must be disclosed. Please amend your report to include the due date and/or terms for all the loan(s) from the candidate. (11 CFR §§ 100.52(a), 100.52(b) and 104.3(d))

7. When a committee reports receiving a loan from the candidate, it is necessary to clarify whether or not the candidate used personal funds or borrowed the money from a lending institution or some other source. Please amend your report to indicate whether the loan is from the candidate's personal funds or if he/she obtained the loan from a bank loan, brokerage account, credit card, home equity line of credit, or other line of credit.

If the candidate loan was obtained from a lending institution, you must also file a Schedule C-1 with the Commission, providing the name of the lending institution and the complete terms of the loan between the candidate and the lending institution. Schedule C-1 can be downloaded from the FEC website at <http://www.fec.gov>.

If the loan(s) was from personal funds, please acknowledge that fact in an amendment to this report. It is important to note that "personal funds" is strictly defined by Commission Regulations. (11 CFR §100.33)

**Please note, you will not receive an additional notice from the Commission on this matter.** Adequate responses must be received by the Commission on or before the due date noted above to be taken into consideration in determining whether audit action will be initiated. Failure to comply with the provisions of the Act may also result in an enforcement action against the committee. Any response submitted by your committee will be placed on the public record and will be considered by the Commission prior to taking enforcement action. **Requests for extensions of time in which to respond will not be considered.**

Electronic filers must file amendments (to include statements, designations and reports) in an electronic format and must submit an amended report in its entirety, rather than just

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those portions of the report that are being amended. For information about the report review process or specific filing information for your committee type, please visit [www.fec.gov/help-candidates-and-committees](http://www.fec.gov/help-candidates-and-committees). For more information about Requests for Additional Information (RAI), why you received a letter, and how to respond, please visit [www.fec.gov/help-candidates-and-committees/request-additional-information](http://www.fec.gov/help-candidates-and-committees/request-additional-information). Should you have any questions regarding this matter or wish to verify the adequacy of your response, please contact me on our toll-free number (800) 424-9530 (at the prompt press 5 to reach the Reports Analysis Division) or my local number (202) 694-1167.

Sincerely,

A handwritten signature in black ink, appearing to read "Denise Stilla", with a stylized flourish at the end.

Denise Stilla  
Senior Campaign Finance Analyst

**Apparent Excessive, Prohibited, and Impermissible Contributions**  
**Devolder-Santos for Congress (C00721365)**

**Apparent Excessive Contributions from Individuals**

Contributor Name	Date	Amount	Election
Barrett, Rachel	3/30/22	\$5,800.00	P2022
Dumezich, Dan	7/27/21	\$1,000.00	P2022
Dumezich, Dan	12/10/21	\$1,000.00	P2022
Dumezich, Dan	1/24/22	\$1,000.00	P2022
Gursoy, Sinan	2/22/22	\$2,900.00	P2022
Gursoy, Sinan	3/30/22	\$5,800.00	P2022
Isaac, Paul	6/30/21	\$1,000.00	P2022
Isaac, Paul	3/5/22	\$1,000.00	P2022
Isaac, Paul	3/31/22	\$1,000.00	P2022
Miller, Barbara	3/30/22	\$5,800.00	P2022
Quentzel, Jill	10/18/21	\$500.00	P2022
Quentzel, Jill	3/24/22	\$2,900.00	P2022
Young-Taylor, Kenneth Christopher	6/18/21	\$1,500.00	G2022
Young-Taylor, Kenneth Christopher	9/30/21	\$1,000.00	G2022
Taylor, Christopher	3/24/22	\$900.00	G2022
Taylor, Christopher P.	2/2/21	\$1,200.00	P2022
Young-Taylor, Kenneth Christopher	2/2/21	-\$1,200.00	P2022
Young-Taylor, Kenneth Christopher	2/11/21	\$2,000.00	P2022
Taylor, Christopher P.	6/18/21	\$1,500.00	P2022
Young-Taylor, Kenneth Christopher	6/25/21	\$600.00	P2022
Young-Taylor, Kenneth Christopher	6/25/21	\$900.00	P2022
Young-Taylor, Kenneth Christopher	9/27/21	\$1,500.00	P2022
Young-Taylor, Kenneth Christopher	9/30/21	-\$1,000.00	P2022
Young-Taylor, Kenneth Christopher	12/15/21	\$2,000.00	P2022
Taylor, Christopher	3/24/22	\$2,900.00	P2022
Zervos, Joanne	3/5/21	\$1,000.00	P2022
Zervos, Joanne	4/5/21	\$1,000.00	P2022
Zervos, Joanne	6/4/21	\$750.00	P2022
Zervos, Joanne	6/21/21	\$250.00	P2022
Zervos, Joanne	6/22/21	-\$100.00	P2022



**Apparent Excessive, Prohibited, and Impermissible Contributions**  
**Devolder-Santos for Congress (C00721365)**

Zervos, Joanne	2/17/22	\$35.00	P2022
Zervos, Joanne	3/8/22	\$25.00	P2022
Zervos, Joanne	3/17/22	\$35.00	P2022
Zervos, Joanne	3/31/22	\$500.00	P2022

**Apparent Excessive Contributions from Committees not Qualified for Multi-Candidate Status**

Contributor Name	Date	Amount	Election
Dependable Conservative Leadership PAC	3/31/22	\$5,000.00	P2022
Freedom Force PAC	4/5/21	\$2,000.00	P2022
Freedom Force PAC	3/31/22	\$3,000.00	P2022

**Apparent In-Kind Contributions Designated to the General Election, Made Before the Primary**

Recipient Name	Date	Amount	Election
Georgiades, John	3/31/22	\$2,900.00	G2022

**Contributions from Possible Prohibited Entities**

Contributor Name	Date	Amount	Election
Extra Innings LLC	1/17/22	\$300.00	P2022

**Contributions from Possible Unregistered Organizations**

Contributor Name	Date	Amount	Election
Friends Of Dan Alter	3/23/22	\$250.00	P2022
Lalota For New York	3/31/22	\$1,000.00	P2022
Molinaro For Dutchess	3/31/22	\$1,000.00	P2022